

## **Exhibit 14**

### **Pattern of Racketeering Activity - Predicate Acts**

## CLAIMANT A

- a. On or about February 2, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email a Doctor's Progress Report and report of his January 7, 2021 knee injection treatment of Claimant A based on purported left knee, lower back, left shoulder and cervical radiculopathy injuries. The examination and treatment was unnecessary and/or was not causally related to the alleged accident, but was provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant A workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- b. On or about February 2, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email a Doctor's Progress Report and report of its January 7, 2021 knee injection treatment of Claimant A based on purported left knee, lower back, left shoulder and cervical radiculopathy injuries. The examination and treatment was unnecessary and/or was not causally related to the alleged accident, but was provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant A workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- c. On or about February 17, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email a Doctor's Progress Report and report of his February 12, 2021 knee injection treatment of Claimant A based on purported left knee, lower back, left shoulder and cervical radiculopathy injuries. The examination and treatment was unnecessary and/or was not causally related to the alleged accident, but was provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant A workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- d. On or about February 17, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email a Doctor's Progress Report and report of its February 12, 2021 knee injection treatment of Claimant A based on purported left knee, lower back, left shoulder and cervical radiculopathy injuries. The examination and treatment was unnecessary and/or was not causally related to the alleged accident, but was

provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant A workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- e. On or about April 26, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email a Doctor's Progress Report and report of his April 15, 2021 examination of Claimant A based on purported left knee, lower back, left shoulder and cervical radiculopathy injuries. The examination was unnecessary and/or was not causally related to the alleged accident, but was provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant A workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- f. On or about April 26, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email a Doctor's Progress Report and report of its April 15, 2021 examination of Claimant A based on purported left knee, lower back, left shoulder and cervical radiculopathy injuries. The examination was unnecessary and/or was not causally related to the alleged accident, but was provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant A workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- g. On or about August 11, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused medical records to be transmitted by mail, facsimile or email, in response to a signed authorization form, which authorized the transmission of Workers' Compensation Board records to be sent to defense counsel. The medical records falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- h. On or about September 1, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kolb caused to be transmitted by mail, facsimile or email a Health Insurance Claim Form and report of his January 21, 2021 left shoulder and left knee MRI of Claimant A based on purported left shoulder and left knee injuries. The examinations were unnecessary and/or was not causally related to the alleged accident but was provided in order to increase the

medical services for which Kolb received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb caused his report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant A workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- i. On or about September 1, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kolb Radiology caused to be transmitted by mail, facsimile or email a Health Insurance Claim Form and report of its January 21, 2021 left shoulder and left knee MRI of Claimant A based on purported left shoulder and left knee injuries. The examinations were unnecessary and/or was not causally related to the alleged accident, but was provided in order to increase the medical services for which Kolb Radiology received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb Radiology caused its report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant A workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- j. On or about September 1, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kolb caused to be transmitted by mail, facsimile or email a Health Insurance Claim Form and report of his January 20, 2021 cervical and lumbar spine MRI's of Claimant A based on purported spinal injuries. The examinations were unnecessary and/or was not causally related to the alleged accident, but was provided in order to increase the medical services for which Kolb received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb caused his report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant A workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- k. On or about September 1, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kolb Radiology caused to be transmitted by mail, facsimile or email a Health Insurance Claim Form and report of its January 20, 2021 cervical and lumbar spine MRI's of Claimant A based on purported spinal injuries. The examinations were unnecessary and/or was not causally related to the alleged accident, but was provided in order to increase the medical services for which Kolb Radiology received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb Radiology caused its report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant A workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

## CLAIMANT B

- l. On or about June 24, 2020, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a Summons and Verified Complaint, falsely attesting to the construction accident, the existence and/or extent of Claimant A's injuries, and the necessity of Claimant A's medical treatment.
- m. On or about January 29, 2020, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Lenox Hill caused to be transmitted by mail, facsimile or email to the NY WCB a Radiologist's Report of an MRI of Claimant A's right knee on October 19, 2019. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Lenox Hill received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Lenox Hill caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- n. On or about February 28, 2020, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's February 25, 2020 follow-up examination. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- o. On or about February 28, 2020, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's February 25, 2020 follow-up examination. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Ny Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- p. On or about September 14, 2020, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Merola caused to be transmitted by mail,

facsimile or email to the NY WCB a C-4 Doctor's Initial Report of Claimant A's August 10, 2020 examination during which Merola recommended a decompressive lumbar laminectomy. The medical services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Merola received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Merola caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- q. On or about October 19, 2020 in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email to the NY WCB an MG-2 Attending Doctor's Request for Approval of Variance and Insurer's Response of Kaplan's request for approval for physical therapy for Claimant A, on October 5, 2020. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- r. On or about November 2, 2020, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Grimm caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's October 14, 2020, examination during which Grimm administered a trigger point injection to the lumbar spine. The medical services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Grimm received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Grimm caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- s. On or about December 21, 2020, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Merola caused to be transmitted by mail, facsimile or email to the NY WCB a Health Insurance Claim Form report and bill pertaining to Claimant A's, December 16, 2020 decompressive lumbar laminectomy performed by Merola. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Merola received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Merola caused the report and bill to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C., to support Claimant A's

workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- t. On or about January 5, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Grimm caused to be transmitted by mail, facsimile or email to the NY WCB a C-4 Doctor's Initial Report of Claimant A's February 11, 2020, examination during which Grimm recommended a lumbar epidural steroid injection. The medical services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Grimm received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Grimm caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- u. On or about January 5, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's November 30, 2020, telemedicine follow-up examination. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- v. On or about January 5, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's October 5, 2020 telemedicine follow-up. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- w. On or about January 5, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's November 30, 2020, telemedicine follow-up examination. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury

lawsuit settlement value. Upon information and belief, NY Ortho caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- x. On or about January 5, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's October 5, 2020 telemedicine follow-up. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- y. On or about January 14, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Lenox Hill caused to be transmitted by mail, facsimile or email to the NY WCB a Health Insurance Claim Form of an MRI for Claimant A on January 3, 2020. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Lenox Hill received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Lenox Hill caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- z. On or about March 24, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's March 1, 2021, physical therapy session. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- aa. On or about March 24, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's March 1, 2021, physical therapy session. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which NY Ortho received reimbursement and to

increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- bb. On or about May 3, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Grimm caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's April 21, 2021, examination during which Grimm administered a trigger point injection to the lumbar spine. The medical services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Grimm received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Grimm caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- cc. On or about June 17, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Grimm caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's June 3, 2021, examination during which Grimm administered a lumbar epidural steroid injection. The medical services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Grimm received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Grimm caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- dd. On or about July 2, 2021, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Merola caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Form Doctor's Progress Note pertaining to Claimant A's, June 28, 2021, follow-up visit performed by Merola. The medical services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Merola received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Merola caused the report and bill to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C., to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- ee. On or about July 2, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Grimm caused to be transmitted by mail, facsimile or email to the NY WCB a C-4.2 Doctor's Progress Report of Claimant A's June 28, 2021, examination during which Grimm deemed it medically necessary for

Claimant A to continue Postoperative care and physical therapy. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Grimm received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Grimm caused his report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- ff. On or about July 12, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Merola caused to be transmitted by mail, facsimile or email a signed medical authorization form, which authorized the transmission of medical records from Merola to be sent to defense counsel. The medical records falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- gg. On or about July 15, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a Verified Bill of Particulars, falsely attesting to the construction accident, the existence and/or extent of Claimant A's injuries, and the necessity of Claimant A's medical treatment.
- hh. On or about July 20, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Kaplan, caused to be transmitted by mail, facsimile or email a signed medical authorization form, which authorized the transmission of medical records from Kaplan to be sent to defense counsel. The medical records falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- ii. On or about July 20, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, NY Ortho, caused to be transmitted by mail, facsimile or email a signed medical authorization form, which authorized the transmission of medical records from NY Ortho to be sent to defense counsel. The medical records falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- jj. On or about July 22, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a Fourth Verified Bill of Particulars, falsely attesting to the construction accident, the existence and/or extent of Claimant A's injuries, and the necessity of Claimant A's medical treatment.
- kk. On or about July 22, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by

mail, facsimile or email a signed authorization form, which authorized the transmission of Workers' Compensation Board records to be sent to defense counsel. The medical records falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.

- ll. On or about October 19, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a Second Supplemental Verified Bill of Particulars, falsely attesting to the construction accident, the existence and/or extent of Claimant A's injuries, and the necessity of Claimant A's medical treatment.
- mm. On or about December 14, 2021, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a Third Supplemental Verified Bill of Particulars, falsely attesting to the construction accident, the existence and/or extent of Claimant A's injuries, and the necessity of Claimant A's medical treatment.
- nn. On or about June 20, 2024, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a Fifth Verified Bill of Particulars, falsely attesting to the construction accident, the existence and/or extent of Claimant A's injuries, and the necessity of Claimant A's medical treatment.

## **CLAIMANT C**

- oo. On or about August 15, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. § 1343, Gorayeb, electronically submitted and filed a Summons and Verified Complaint falsely attesting to the July 7, 2022 construction accident, the existence and/or extent of Claimant C's injuries, and the necessity of Claimant C's medical treatment.
- pp. On or about August 16, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email a report of his August 16, 2022 examination of Claimant C based on purported right shoulder, cervical radiculopathy and right wrist injuries. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- qq. On or about August 16, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email a report of its August 16, 2022 examination of Claimant C based on purported right shoulder, cervical radiculopathy and right wrist injuries. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- rr. On or about August 16, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a signed authorization form, which authorized the transmission of Workers' Compensation Board records to be sent to NY Ortho. The medical records contained therein falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- ss. On or about September 20, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Grimm caused to be transmitted by mail, facsimile or email a report of his September 20, 2022 examination of Claimant C based on purported right shoulder, cervical and lumbar radiculopathy, and right wrist injuries. The medical services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Grimm received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Grimm caused his report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- tt. On or about September 20, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email a report of its September 20, 2022 examination of Claimant C based on purported right shoulder, cervical and lumbar radiculopathy, and right wrist injuries. The medical services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- uu. On or about September 21, 2022, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a signed authorization form, which authorized the transmission of Workers' Compensation Board records to be released. The medical records contained therein falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- vv. On or about September 23, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kolb caused to be transmitted by mail, facsimile or email a Health Insurance Claim Form and report of his September 6, 2022 cervical spine MRI of Claimant C based on a purported cervical spine injury. The MRI services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Kolb received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb caused the Health Insurance Claim Form and report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- ww. On or about September 23, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kolb caused to be transmitted by mail, facsimile or email a Health Insurance Claim Form and report of his September 6, 2022 cervical spine MRI of Claimant C based on a purported cervical spine injury. The MRI services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Kolb received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb caused the Health Insurance Claim Form and report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- xx. On or about September 24, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kolb caused to be transmitted by mail, facsimile or email a Health Insurance Claim Form and report of his September 7, 2022 right elbow MRI of Claimant C based on a purported right elbow injury. The MRI services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Kolb received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb caused the Health Insurance Claim Form and report to be transmitted by mail, facsimile or

email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- yy. On or about September 24, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kolb Radiology caused to be transmitted by mail, facsimile or email a Health Insurance Claim Form and report of his September 7, 2022 right elbow MRI of Claimant C based on a purported right elbow injury. The MRI services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Kolb Radiology received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb Radiology caused the Health Insurance Claim Form and report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- zz. On or about October 26, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kolb Radiology caused to be transmitted by mail, facsimile or email a Health Insurance Claim Form and report of its October 5, 2022 lumbar spine MRI of Claimant C based on a purported lumbar spine injury. The MRI services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Kolb Radiology received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb Radiology caused the Health Insurance Claim Form and report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- aaa. On or about October 26, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kolb caused to be transmitted by mail, facsimile or email a Health Insurance Claim Form and report of his October 5, 2022 lumbar spine MRI of Claimant C based on a purported lumbar spine injury. The MRI services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Kolb received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb caused the Health Insurance Claim Form and report to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- bbb. On or about October 31, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email a Provider's Attestation and Statement of Medical Necessity, requesting authorization for additional right shoulder and right elbow physical therapy for

Claimant C, and certifying that his statements were true and correct. The requested medical services were unnecessary and/or were not causally related to the alleged accident, but were requested in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his attestation to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- ccc. On or about December 30, 2022, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a signed authorization form, which authorized the transmission of Workers' Compensation Board records to be sent to defense counsel. The medical records contained therein falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- ddd. On or about December 30, 2022, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a signed authorization form, which authorized the transmission of Workers' Compensation Board records to be sent to defense counsel. The medical records contained therein falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- eee. On or about April 17, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email a report of a March 22, 2023 right shoulder rotator cuff surgery on Claimant C. The report alleges Kaplan performed a rotator cuff repair, a subacromial decompression with bursectomy of subacromial and subdeltoid bursa and a glenohumeral synovectomy, for purported right shoulder injuries. The surgery was unnecessary and/or was not causally related to the alleged accident, but was performed in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his attestation to be transmitted by mail, facsimile or email to the Gorayeb and/or Fogelgaren LLP to support Claimant C workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

## CLAIMANT D

- fff. On or about August 8, 2020, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a Summons and Verified Complaint, falsely attesting to the construction accident, the existence and/or extent of Claimant B's injuries, and the necessity of Claimant B's medical treatment.
- ggg. On or about February 8, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Grimm caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and reports of his January 26, 2023 lumbar and cervical interlaminar epidural steroid injections for Claimant D based on a purported lumbar radiculopathy injury. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which Grimm received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Grimm caused his reports to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- hhh. On or about February 8, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and reports of his January 26, 2023 lumbar and cervical interlaminar epidural steroid injections for Claimant D based on a purported lumbar radiculopathy injury. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its reports to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- iii. On or about August 8, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. § 1343, Gorayeb, electronically submitted and filed a Summons and Verified Complaint falsely attesting to the July 7, 2022 construction accident, the existence and/or extent of Claimant D's injuries, and the necessity of Claimant D's medical treatment.

- jjj. On or about November 18, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email reports of his November 17, 2022 examination of Claimant D based on a purported injuries to both knees, both shoulders, and the cervical spine. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his reports to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- kkk. On or about December 12, 2022, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email a Provider's Attestation and Statement of Medical Necessity, requesting authorization for a prescription of percocet medication for Claimant D, and certifying that his statements were true and correct. The requested medication was unnecessary and/or was not causally related to the alleged accident, but was requested in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his attestation to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- lll. On or about January 9, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Gorayeb Partners or an employee of the Gorayeb & Associates, P.C. at the direction of Gorayeb Partners, caused to be transmitted by mail, facsimile or email a Summons and Verified Complaint, falsely attesting to the construction accident, the existence and/or extent of Claimant D's injuries, and the necessity of Claimant D's medical treatment.
- mmm. On or about January 27, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Grimm caused to be transmitted by mail, facsimile or email a Provider's Attestation and Statement of Medical Necessity, requesting authorization for a prescription of celecoxib medication for Claimant D, and certifying that his statements were true and correct. The requested medication was unnecessary and/or was not causally related to the alleged accident, but was requested in order to increase the medical services for which Grimm received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Grimm caused his attestation to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- nnn. On or about February 6, 2023, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Weinstein, caused to be transmitted by mail, facsimile or email a signed authorization form, which authorized the transmission of Workers' Compensation Board records to be sent to defense counsel. The medical records falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- ooo. On or about February 7, 2023, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, NY ortho, caused to be transmitted by mail, facsimile or email a signed authorization form, which authorized the transmission of Workers' Compensation Board records to be sent to defense counsel. The medical records falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- ppp. On or about February 27, 2023, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Weinstein, caused to be transmitted by mail, facsimile or email a signed authorization form, which authorized the transmission of Workers' Compensation Board records to be sent to defense counsel. The medical records falsely represented medical treatment that was either not performed or was unnecessary for injuries that were either not incurred or misrepresented.
- qqq. On or about March 28, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email a Provider's Attestation and Statement of Medical Necessity, requesting authorization for physical therapy to the right knee and right shoulder for Claimant D, and certifying that his statements were true and correct. The requested medical services was unnecessary and/or was not causally related to the alleged accident, but was requested in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his attestation to be transmitted by mail, facsimile or email to the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- rrr. On or about March 30, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and a report of a March 7, 2023 physical examination of Claimant D based on a purported right knee and right shoulder injuries. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- sss. On or about March 30, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and a report of a March 7, 2023 physical examination of Claimant D based on a purported right knee and right shoulder injuries. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its report to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- ttt. On or about July 11, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Grimm caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and medical report of his June 28, 2023 physical examination of Claimant D. The medical services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which Grimm received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Grimm caused his reports to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- uuu. On or about July 11, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and medical report of its June 28, 2023 physical examination of Claimant D. The medical services were unnecessary and/or were not causally related to the alleged accident, but were provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its report to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- vvv. On or about August 3, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and a report of right knee Euflexxa injection performed on July 26, 2023 on Claimant D based on a purported right knee injury. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers'

Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- www. On or about August 3, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and a report of a right knee Euflexxa injection performed on July 26, 2023 on Claimant D based on a purported right knee injury. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its report to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- xxx. On or about August 9, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and a report of right knee Euflexxa injection performed on August 2, 2023 on Claimant D based on a purported right knee injury. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his report to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- yyy. On or about August 9, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and a report of right knee Euflexxa injection performed on August 2, 2023 on Claimant D based on a purported right knee injury. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its report to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- zzz. On or about October 10, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Grimm caused to be transmitted by mail, facsimile or email Health Insurance Claim Forms and NYWC Progress Medical Narrative Report, in which he falsely attests to lumbar and cervical radiculopathy injuries, and lower back pain injuries of Claimant D. The medical services were unnecessary

and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which Grimm received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Grimm caused his reports to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- aaaa. On or about November 8, 2023, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Comprehensive Orthopedic & Spine Care caused to be transmitted by mail, facsimile or email to the NY WCB an examination report for Claimant B's lumbar and cervical spine which diagnosed lumbar and cervical radiculopathy on November 8, 2023. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Comprehensive Orthopedic & Spine Care received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Comprehensive Orthopedic & Spine Care caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- bbbb. On or about November 8, 2023, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Kolb caused to be transmitted by mail, facsimile or email to the NY WCB a Health Insurance Claim Form for a lumbar spine MRI on October 23, 2023. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Kolb received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant B's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- cccc. On or about November 9, 2023, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Weinstein caused to be transmitted by mail, facsimile or email to the NY WCB an examination report for Claimant B's lumbar and cervical spine which diagnosed lumbar and cervical radiculopathy on November 8, 2023. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Weinstein received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Weinstein caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- dddd. On or about December 14, 2023, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Weinstein caused to be transmitted by mail, facsimile or email to the NY WCB an operative report for Claimant B's anterior cervical decompression and fusion C4-C6 on December 14, 2023. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Weinstein received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Weinstein caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- eeee. On or about December 14, 2023, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Comprehensive Orthopedic & Spine Care caused to be transmitted by mail, facsimile or email to the NY WCB an operative report for Claimant B's anterior cervical decompression and fusion C4-C6 on December 14, 2023. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Comprehensive Orthopedic & Spine Care received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Comprehensive Orthopedic & Spine Care caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant A's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- ffff. On or about December 16, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, Kaplan caused to be transmitted by mail, facsimile or email reports of his September 27, 2023 examination of Claimant D based on a purported injuries to both knees. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which Kaplan received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kaplan caused his reports to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers' Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- gggg. On or about December 16, 2023, in furtherance of the Fraud Scheme, and in violation of 18 U.S.C. §§ 1341 or 1343, NY Ortho caused to be transmitted by mail, facsimile or email reports of its September 27, 2023 examination of Claimant D based on a purported injuries to both knees. The medical services were unnecessary and/or were not causally related to the alleged accident, but was provided in order to increase the medical services for which NY Ortho received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, NY Ortho caused its reports to be transmitted by mail, facsimile or email to Gorayeb and/or Fogelgaren LLP, and/or the Workers'

Compensation Board to support Claimant D's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

- hhhh. On or about December 19, 2023, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Kolb caused to be transmitted by mail, facsimile or email to the NY WCB a Health Insurance Claim Form for a cervical spine MRI on November 16, 2023. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Kolb received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Kolb caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant B's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- iiii. On or about January 3, 2024, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Comprehensive Orthopedic & Spine Care caused to be transmitted by mail, facsimile or email to the NY WCB a bill and operative report for Claimant B's anterior cervical decompression and fusion C4-C6 on December 14, 2023. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Comprehensive Orthopedic & Spine Care received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Comprehensive Orthopedic & Spine Care caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant B's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.
- jjjj. On or about January 3, 2024, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Comprehensive Orthopedic & Spine Care caused to be transmitted by mail, facsimile or email to the NY WCB a Health Insurance Claim Form for an examination on December 6, 2023. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Comprehensive Orthopedic & Spine Care received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Comprehensive Orthopedic & Spine Care caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant B's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.

kkkk On or about January 4, 2024, in furtherance of the Fraud Scheme, and in violation of 18U.S.C. §§ 1341 or 1343, Weinstein caused to be transmitted by mail, facsimile or email to the NY WCB a Health Insurance Claim Form for an examination on December 6, 2023. The medical services were unnecessary and/or were not causally related to the alleged accident but were provided in order to increase the medical services for which Weinstein received reimbursement and to increase workers' compensation claim and personal injury lawsuit settlement value. Upon information and belief, Weinstein caused this report to be transmitted by mail, facsimile or email to Gorayeb & Associates, P.C. to support Claimant B's workers' compensation claim and personal injury lawsuit in furtherance of the scheme to defraud.